

Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: GBW Railcar Serv. Co.
Address: 15624 258th Road
Gummingus, KS 66016
EPA ID Number: KC 043936277 Date: 08/11/2016

This notice is provided to call your attention to the following areas of noncompliance with state and federal regulations. This notice does not constitute a compliance order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA and may not be a complete listing of all violations resulting from the the inspection.

Citation	Description of Violation
(1) 40 CFR 262.11	Hazardous Waste determination not conducted.
	(A) 150-gallons of bulk tank water per month.
	(B) 55-gallons of Railcar PPE per month.
	(C) One full 10-gallon drum of unknown liquid
	located at the Railcar Cleaning Equipment Area
	(D) Grease oil rinse water
	(E) One 20-yard roll-off of spent blast media per
	month
	(F) One Pen rack generated in Building 1+3
	(G) 55-gallon drum of waste paint related material
	(Involving proper PPE etc) generated per week
	(H) Waste Air of (Impacted) (Cool Water)

You are requested to submit a written response within 14 calendar days of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U. S. Environmental Protection Agency, Region VII
Environmental Sciences + Technology Division
300 Minnesota Avenue
Kansas City, KS 66001
ATTN: Michael J. Martin

If you have any questions about this Notice or wish to discuss your response, you may call me at
(913) 551-7179, or Ed Buckner (Compliance Officer) at
(913) 551-7621.

This Notice prepared by Michael J. Martin Date: 08/11/2016

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: Andrea R. Jones Date: 8/11/16
Signature: [Signature]
Title: ENS Manager

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Citation

Description of Violation

- | Citation | Description of Violation |
|--|--------------------------|
| (H) ^{non} (X) One 5-gallon drum of Kerosene stored at the Equipment Unit located near the Print Shop & Print Shop | |
| (J) (X) Parts Washer solvent stored in the parts washer unit at Building 1 | |
| (S) (K) One 5-gallon pail of Waste NFK Bags per month generated at the Print Shop | |
| (K) (X) Four fluorescent lamps (one box) at Building 3 | |
| (L) (X) One Full 12-gallon drum of Heavy Duty Acid Cleaner (4/3) | |
| (M) (X) One 30 Full 5-gallon pail (non-labeled) at Building 3 | |
| (N) (X) One 5-gallon pail (1 cup full) of Dexron III + Mercon ATF at Building 3 | |
| (O) (P) 11/10/15 - Non-hazardous shipment of Hexane/Toluene Waste (4/675162) | |

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Citation	Description of Violation
(2) K.H.R 262.31-4	Notification (change of site contact) not made within 60 days
(3) 40 CFR 262.31	Hazardous Waste Storage drums not labeled per DOT - 15 drums of caustic sil waste located at the Work Track
(4) 40 CFR 262.32 (a)+(b)	Hazardous Waste Storage drums not marked per DOT (A) Same drums in citation #3 (B) One 55-gallon drum of waste paint (Paint Shop)

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The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: Andrea P. Jones Date: 8/11/16
Signature: _____
Title: EXS Manager

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(5) 40CFR 262.34(a)(2)	Accumulation start date, not marked on hazardous waste storage drums
	- Three drums (250, 200, 200) of Crude oil waste (Lush Track)
(6) 40CFR 262.34(a)(3)	Storage drums not labeled with the words "Hazardous Waste"
	(A) Some drums in citation #3
* (7) KAR 28-31-262(c)(7)	Satellite drum not labeled with the words "Hazardous Waste"
	- One 1/4 full drum of white paint (Paint Shop)
	α (corrected at time of inspection)

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Printed Name: Andrew P. Jones Date: 8/11/16
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Citation	Description of Violation
(8) 40 CFR 265.171	Drums storing hazardous waste, not in good condition 1A) One 55-gallon storage drum of crude oil waste (Wash Truck) (dented lid) 1B) One 55-gallon satellite drum of aerosol can waste (Kwik-Hop) (bulging lid)
(9) 40 CFR 265.15(d)	Weekly hazardous waste inspections not documented.
(10) 40 CFR 265.35	Adequate aisle space not provided for the unobstructed movement of personnel, fire protection equipment, + spill control equipment (Wash Truck - 14 storage drums of crude oil waste).

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Printed Name: Andrea R. Jones Date: 8/11/16
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Title: ENS Manager

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(11) 40 CFR 265.16(a)(1)	Hazardous Waste Management training program not established.
(12) 40 CFR 265.52(d)	Contingency Plan does not list the addresses of the Emergency Coordinators.
(13) 40 CFR 265.53(b)	Revision 602/24/16 of the contingency plan not provided to local police departments, hospitals, and State/local emergency response teams.

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This Notice prepared by

Michael S. Martin

Date:

08/11/2016

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name:

Andrea P. Jones

Date:

8/11/16

Signature:

Title:

EHS Manager

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Citation	Description of Violation
(14) 40CFR 279.22(b)	Used oil storage units not in good condition (A) One 230-gallon used oil A3T (dented + rusted) (B) One 5-gallon drum of used oil Filters (lid dented + rusted)
(15) 40CFR 279.22(c)	Containers of used oil not labeled with the words "Used Oil" (A) One full 5-gallon pail of used oil (Bldg. 3) (B) One full 5-gallon pail of used oil (Bldg. 3)
(16) 40CFR 279.22(d)(3)	Used oil release not cleaned-up + managed properly 10 by 10 foot area (Shear Cutting Machine) at Building 3.

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(17) 40 CFR 268.7(a)(2)

LDR not on-file (shims of Crude Waste
not waste print to Hatching Crystal-Clean)

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